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October 11, 2018

VIA ECF

Hon. Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Lamont Evans, et al., 17 CR 684 (ER)

Dear Judge Ramos:

I am writing on behalf of defendant Tony Bland to respectfully request a modification of the defendant's conditions of release which would permit him to travel to New Jersey from October 25-28, 2018 in order to visit Princeton University with his teenage son in anticipation of possibility attending this institution. Mr. Bland's Pretrial Services officer has approved this trip and the government, by AUSA Noah Solowiejczyk, has no objection to this request. And of course, should Your Honor approve this request, Mr. Bland will provide Pretrial Services with a detailed itinerary of his whereabouts.

By way of background, on October 10, 2017, Judge Parker released Mr. Bland on a \$100,000 personal recognizance bond signed by two financially responsible persons with the special conditions that: 1) his travel be restricted to the Southern and Eastern Districts of New York, and the Southern and Central Districts of California; 2) that he surrender all travel documents; and 3) that he refrain from any contact with his codefendants outside of the presence of his attorneys. Since this case began, there has not been a single suggestion that Mr. Bland has violated the conditions of his release.

JEFFREY LICHTMAN

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Thank you for your consideration on this application. I remain available for a conference should Your Honor deem it necessary.

Respectfully submitted,

A handwritten signature in dark ink, consisting of a large, stylized 'J' followed by a horizontal line and a loop.

Jeffrey Lichtman

cc: Eli Mark, Esq.
Edward Diskant, Esq.
Aline Flord, Esq.
Noah Solowiejczyk, Esq.
Robert Boone, Esq.
Assistant United States Attorneys (by ECF)

Francesca Tessier-Miller
United States Pretrial Services (by email)

So Ordered:

Hon. Edgardo Ramos, U.S.D.J.